MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Delco Remy America, Inc.
6512 Production Road
Anderson, IN 46013

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 095-8961-00073	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Four (4) Natural gas fired space heaters
One (1) 1,000 gallon capacity gasoline storage tank
One (1) 1,000 gallon capacity diesel storage tank

Malfunction Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates an engine starter motor testing operation.

Authorized Individual:	Delco Remy, Inc.
Source Address:	6512 Production Road, Anderson, IN 46013
Mailing Address:	6512 Production Road, Anderson, IN 46013
Phone Number:	(317) 778-6639
SIC Code:	8734
County Location:	Madison
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Live gasoline engine test stands testing a maximum of thirty (30) gasoline fired engines simultaneously, consuming a maximum of 8.6 gallons per hour of gasoline, and exhausting at two (2) stacks;

(b) Live diesel engine test stands testing a maximum of twenty (20) diesel fired engines simultaneously, consuming a maximum of 5.4 gallons per hour of diesel, and exhausting at twenty stacks;

(c) Four (4) natural gas fired space heaters, each rated at 0.100 million (MM) Btu/hr;

(d) One (1) 1,000 gallon capacity gasoline storage tank; and

(e) One (1) 1,000 gallon capacity diesel storage tank.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21][326 IAC 2-7]

(a) The total source potential to emit of CO is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential to emit to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

(c) Any change or modification which may increase the potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP to equal to or greater than ten (10) tons per year or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs to greater than or equal to twenty-five (25) tons per year shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Source Modification [326 IAC 2-7-10.5]

(a) The Permittee must comply with the requirements of [326 IAC 2-7-10.5] whenever the Permittee seeks to construct new emissions units, modify existing emissions units, or otherwise modify the source.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM,U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee*,* IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description: Live Gasoline engine test stands testing a maximum of thirty (30) gasoline fired engines simultaneously, consuming a maximum of 8.6 gallons per hour of gasoline, and exhausting at two (2) stacks.

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3, the PM from the live gasoline engine test stands shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour = diesel fuel fuel consumption rate.

Pursuant to this rule, PM emissions from gasoline engine firing shall be limited to 0.36 pounds per hour.

D.1.2 Carbon Monoxide Emission Factor

The Permittee is required to utilize and comply with the approved site specific emission factors for the Gasoline engine test stands Carbon Monoxide emission factor. The approved CO emission factor is 14.06 lbs/hr CO or 1.14 lbs of CO gallon of gasoline.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable Compliance Monitoring Requirements

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable Record Keeping and Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description: Live Diesel engine test stands testing a maximum of twenty (20) diesel fired engines simultaneously, consuming a maximum of 5.4 gallons per hour of diesel, and exhausting at twenty (20) stacks.

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3, the PM from the live Diesel engine test stands shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour = diesel fuel fuel consumption rate.

Pursuant to this rule, PM emissions from Diesel engine firing shall be limited to 0.30 pounds per hour.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable Compliance Monitoring Requirements

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable Record Keeping and Reporting Requirements

SECTION D.3 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities
(1) Four (4) Natural gas fired space heaters, each rated at 0.100 million (MM) Btu/hr.
(2) One (1) 1,000 gallon capacity gasoline storage tank.
(3) One (1) 1,000 gallon capacity diesel storage tank.

Emission Limitations and Standards

D.3.1 Particulate Matter Emission Limitation [326 IAC 6-2-1(a)]

Pursuant to 326 IAC 6-2-1 (a), Particulate emissions from existing indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

Pt = 1.09/ (Q^0.26) where Pt = lbs of particulate matter emitted per MMBtu heat input
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Compliance Determination Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements

There are no applicable Record Keeping and Reporting Requirements

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM /PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name: Delco Remy America, Inc.
Source Location: 6512 Production Road, Anderson, Indiana 46013
County: Madison
SIC Code: 8734
Operation Permit No.: 095-8961-00073
Permit Reviewer: Lynn Nieman

On June 15, 1999, the Office of Air Management (OAM) had a notice published in the Anderson Herald, Anderson, Indiana, stating that Delco Remy America, Inc. had applied for a Minor Source Operating Permit to operate a stationary engine starter motor testing source . The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 12, 1999, Delco Remy submitted comments on the proposed Minor Source Operating Permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes.

Responses to Comments

Comment 1:

Following reconstruction of the gasoline wing in the Spring of 1998, the Live Engine Test Building has only two (2) stacks not 30. The areas that need to be corrected are: A.2(a), D.1 (boxed statement), and TSD Page 1 (a).

Response to Comment 1:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. However, the following changes were made in Sections A.2(a), and D.1:

(a) Live gasoline engine test stands testing a maximum of thirty (30) gasoline fired engines simultaneously, consuming a maximum of 8.6 gallons per hour of gasoline, and exhausting at ~~thirty (30)~~ **two** stacks;

Emissions unit Description: Live Gasoline engine test stands testing a maximum of thirty (30) gasoline fired engines simultaneously, consuming a maximum of 8.6 gallons per hour of gasoline, and exhausting at ~~thirty (30)~~ **two (2)** stacks.

Comment 2:

There is a typographical error in C.10, last sentence. The word permittee has a 4 in it. In D.1.2 the emission factor should read 1.14 lbs of CO gallon of gasoline.

Response to Comment 2:

The following changes were made as a result of Comment 2.

The documentation submitted by the Pe~~4~~rmittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

D.1.2 Carbon Monoxide Emission Factor

The Permittee is required to utilize and comply with the approved site specific emission factors for the Gasoline engine test stands Carbon Monoxide emission factor. The approved CO emission factor is 14.06 lbs/hr CO or 1.14 lbs~~/~~ **of** CO gallon of gasoline.

Comment 3:

Is C.1 (b) a Part 70 requirement and not PSD?

Response to Comment 3:

Condition C.1(b) was referring to Part 70 since the 100 tons per year level could be emitted prior to the 250 tons per year PSD level. However, the reference to PSD has been removed in order to correct the citation. The condition will be changed to the following:

(b) Any change or modification which may increase the potential to emit to ~~250~~ **100** tons per year from this source, shall cause this source to be considered a major source under ~~PSD, 326 IAC 2-2 and 40 CFR 52.21~~ **326 IAC 2-7**, and shall require approval from IDEM, OAM prior to making the change.

Comment 4:

Requirements for emission reporting in C.17(a), (b), and (c) are made void in section TSD, existing approvals, last sentence (page 2) "Therefore 326 IAC 2-6 (emission reporting) does not apply also it is not necessary for a usage limitation." Additionally on TSD, State Rule Applicability (page 4), this statement voids any requirement for emission reporting.

Response to Comment 4:

Emission reporting is no longer necessary due to potential emissions that are now less than 100 tons per year. Therefore, pursuant to Comment 4, Condition D.17 (a), (b), and (c) will be removed and the conditions following will be renumbered accordingly. The following change will be made:

~~C.17 Annual Emission Statement [326 IAC 2-6]~~

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Technical Support and Modeling Section, Office of Air Management~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM,on or before the date it is due.~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

Comment 5:

In the proposed permit, sections D.1.4, and D.1.5, DRA feels that since there is no continuous stream of emissions due to the nature of live engine testing (several starts and stops per minute) that we could not correctly check opacity. Therefore, DRA would like these provisions along with the corresponding sections for the Diesel wings (D.2.3 and D.2.4) taken out of the proposed permit.

Response to Comment 5:

Due to the fact that Delco Remy America operates an engine testing facility where there are no continuous streams of emissions from Conditions D.1.4 and D.1.5 and D.2.3 and D.2.4 can be removed from the permit. The conditions will now be changed to the following:

~~D.1.4 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the twenty (20) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]~~

~~D.1.5 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the Live Gasoline engine test stands stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

~~D.2.3 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the twenty (20) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

~~Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]~~

~~D.2.4 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the Live Diesel engine test stands stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

Comment 6:

Section D.3.3 of the proposed permit is concerned with space heaters and fuel storage tanks. DRA feels those D.3.3 requirements for opacity monitoring is unwarranted due to the lack of our nearly lack of visible emissions for either source. DRA would like this section taken out of the proposed permit.

Response to Comment 6:

Section D.3 which addresses the space heaters and fuel storage tanks will not need visible emissions. Condition D.3.3 will be removed, the following changes will be made in the permit:

~~D.3.3 Visible Emissions Notations~~

~~(a) Daily visible emission notations of the Live Gasoline engine test stands stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

Comment 7:

On TSD, page 5, first sentence requires DRA to submit an annual statement of actual emissions for the purpose of a State fee. DRA does not believe that a minor source is subject to an annual State fee.

Response to Comment 7:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Due to the fact that Delco Remy is not subject to emissions reporting (326 IAC 2-6), the standard language should have been removed. The condition should have read:

326 IAC 2-6 (Emission Reporting)

This source is located in Madison County and the potential to emit CO and NOx is less than one-hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

~~The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.~~

Comment 8:

TSD, page 5, 326 IAC 5-1 deals with opacity limits. DRA would like this taken out of the TSD, also, due to the nature of live engine testing opacity can not be completely correctly.

Response to Comment 8:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Due to the fact that Delco Remy is a live engine testing operation, the standard language should have been removed. The condition should have read:

~~326 IAC 5-1 (Visible Emissions Limitations)~~

~~Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:~~

~~(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.~~

~~(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Delco Remy, Inc.
Source Location: 6512 Production Road, Anderson, Indiana 46013
County: Madison
SIC Code: 8734
Operation Permit No.: 095-8961-00073
Permit Reviewer: Lynn Nieman

On August 13, 1996, Delco Remy, Inc. was issued a Construction Permit (095-5562-00073) for this source. In the Construction Permit, emission factors for the Gasoline Engine Test Stands were based on factors from Air Pollutant Emission Factors (AP-42) for reciprocating internal combustion engines. On March 23, 1999, Delco Remy submitted a letter to IDEM, OAM requesting a change in the Gasoline Engine Test Stand emission factors. On November 24, 1998 stack emissions were performed, results were received and verified by IDEM, OAM. The new Gasoline Engine Test Stand Emission factors are approved results from site specific testing at Delco Remy. Due to this change the status of the entire source has changed to a MSOP. This approval is being issued for the entire source to reflect the correct status of the source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Live gasoline engine test stands testing a maximum of thirty (30) gasoline fired engines simultaneously, consuming a maximum of 8.6 gallons per hour of gasoline, and exhausting at thirty (30) stacks;

(b) Live diesel engine test stands testing a maximum of twenty (20) diesel fired engines simultaneously, consuming a maximum of 5.4 gallons per hour of diesel, and exhausting at twenty stacks;

(c) Four (4) natural gas fired space heaters, each rated at 0.100 million (MM) Btu/hr;

(d) One (1) 1,000 gallon capacity gasoline storage tank; and

(e) One (1) 1,000 gallon capacity diesel storage tank.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 095-5562-00073, issued on August 13, 1996;

All conditions from previous approvals were incorporated into this permit except the following:

(a) CP 095-5562-00073, issued on August 13, 1996

Condition Operation Condition (3): That the input diesel fuel and gasoline fuel of the diesel and gasoline engine firing shall be limited to 22,400 and 50,000 gallons/365-day period, respectively, rolled on a daily basis. This production limitation is equivalent to source total emissions of 197.4 tons carbon monoxide (CO)/365-day period, rolled on a daily basis (see attached reporting form). During the first 365 days of operation, the input material usage shall be limited such that the total usage divided by the accumulated days of operation shall not exceed the limit specified. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Condition - Operation Condition (4): That pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of Delco Remy America must annually submit an emission statement for the facility. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. A copy of this rule is enclosed. The annual statement must be submitted to:

Data Support Section
Office of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Condition - Operation Condition (7): That a log of information necessary to document compliance with operation permit condition number 3 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management (OAM). A quarterly summary shall be submitted to:

Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 30 days after the end of the quarter being reported in the format attached. These reports shall include diesel fuel usages, gasoline fuel usages and CO emissions.

Reason not incorporated: Operation Conditions 3, 4, and 7 were not incorporated into this permit due to the change in gasoline engine emission factors. When the emission factors were changed from AP-42 factors to approved results from site specific emissions testing, the gasoline engine potential emissions were greatly reduced. Therefore, 326 IAC 2-6 (Emission Reporting) does not apply also it is not necessary for a usage limitation

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 24, 1999, with approval of the emission testing on April 28, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	1.50
PM-10	1.51
SO_2	1.37
VOC	15.48
CO	46.26
NO_x	22.56

HAP's	Potential To Emit (tons/year)
Benzene	0.0031
Toluene	0.0014
Xylene	0.0009
Propylene	0.0009
1,3 Butadiene	0.0001
Formaldehyde	0.00394
Acetaldehyde	0.00031
Acrolein	0.0003
Naphthalene	0.00029
TOTAL	0.021

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Madison County has been classified as attainment or unclassifiable for Particulate Matter. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Subparts Ka and Kb do not apply to the storage tanks due to both the dates of construction and capacity.

There are no There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

326 IAC 2-2 is not applicable to this source. With the use of the approved site specific emission factors, CO emissions are less than 100 tons per year. Therefore the annual material usage limitations from CP-095-5562-00073 no longer are applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Madison County and the potential to emit CO and NOx is less than one-hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Diesel Engine Firing Operation

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3, issued on August 13, 1996, the particulate matter (PM) from the diesel engine firing operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Pursuant to this rule, PM emissions from diesel engine firing shall be limited to 0.30 lbs per hour.

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

Although this rule is applicable to all stationary sources of carbon monoxide, commencing operation after March 21, 1972, there are no applicable emission standards for internal combustion engine firing or testing.

State Rule Applicability - Individual Facilities

Gasoline Engine Firing Operation

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3, issued on August 13, 1996, the particulate matter (PM) from the gasoline engine firing operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Pursuant to this rule, PM emissions from diesel engine firing shall be limited to 0.36 lbs per hour.

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

Although this rule is applicable to all stationary sources of carbon monoxide, commencing operation after March 21, 1972, there are no applicable emission standards for internal combustion engine firing or testing.

State Rule Applicability - Individual Facilities

Insignificant Activities

326 IAC 6-2-1(a) Particulate Matter Emission Limitation

Pursuant to 326 IAC 6-2-1 (a), Particulate emissions from existing indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

Pt = 1.09/ (Q^0.26) where Pt = lbs of particulate matter emitted per MMBtu heat input
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this engine starter motor testing operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 095-8961-00073.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr < 100 MMBtu/hr
Small Industrial Boiler

Company Name: Delco Remy America, Inc.
Address City IN Zip: 6512 Production Road, Anderson, IN 46013
CP: 095-8961-00073
Reviewer: Lynn Nieman
Date: May 14, 1999

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.4	3.5

Heat Input Capacity includes four (4) space heaters each rated at 0.100 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.6	100.0	5.50	84.0
Potential Emission in tons/yr	0.00	0.01	0.00	0.18	0.01	0.15

Methodology

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, Residential Furnaces (No SCC)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel and Gasoline Fueled

Company Name: Delco Remy America, Inc. **CP#:** 095-5562
Address City, IN Zip: 6512 Production Road, Anderson, IN 4601 **Plt ID:** 095-00073
Reviewer: Lynn Nieman **Date:** May 3, 1996

State Potential Emissions (uncontrolled):

A. Diesel Engine Emissions calculated based on heat input capacity (MMBtu/hr)

Max. Fuel Usage (gal/hr)	Fuel Heating Value (Btu/gal)	Heat Input Capacity (MMBtu/hr)
5.4	141,000	0.761

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.36	0.95
State Potential Emission in tons/yr	1.03	1.03	0.97	14.71	1.20	3.17

B. Gasoline Engine Emissions calculated based on heat input capacity (MMBtu/hr)

Max. Fuel Usage (gal/hr)	Fuel Heating Value (Btu/gal)	Heat Input Capacity (MMBtu/hr)
8.6	125,000	1.075

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.10	0.10	0.084	1.63	3.03	9.1
State Potential Emission in tons/yr	0.47	0.47	0.40	7.67	14.27	42.94

Methodology:

Heat Input Capacity = Max. Fuel Usage (gal/hr) * Fuel Heating Value (Btu/gal) * (MM/1e6)
Emission Factors are from AP-42 (Fifth edition, January 1995), Table 3.3-2
* Emission Factors for Gasoline are the OAM approved results from site specific emissions testing
Diesel Emission (tons/yr) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * (8,760 hr/yr) * (ton/2,000 lb)
Gasoline Emissions (tons/yr) = Site Specific Emission Factor (1.14 lbs CO/gallon of gasoline) * Max. Fuel Usage (gal/hr) * (8760 hr/yr) * (ton/2000 lb)
Controlled Emissions = Uncontrolled Emissions * Material Usage Limitation

Methodology:

Heat Input Capacity = Max. Fuel Usage (gal/hr) * Fuel Heating Value (Btu/gal) * (MM/1e6)

Emission Factors are from AP-42 (Fifth edition, January 1995), Table 3.3-2

* Emission Factors for Gasoline are the OAM approved results from site specific emissions testing

Diesel Emission (tons/yr) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * (8,760 hr/yr) * (ton/2,000 lb)

Gasoline Emissions (tons/yr) = Site Specific Emission Factor (1.14 lbs CO/gallon of gasoline) * Max. Fuel Usage (gal/hr) * (8760 hr/yr) * (ton/2000 lb)

Controlled Emissions = Uncontrolled Emissions * Material Usage Limitation

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - HAP from Diesel Firing

Company Name: Delco Remy America, Inc.
Address City, IN Zip: 6512 Production Road, Anderson, IN 46013
Reviewer: Lynn Nieman

CP#: 095-5562
Plt ID: 095-00073
Date: May 3, 1996

A. Diesel Engine Emissions calculated based on heat input capacity (MMBtu/hr)

Max. Fuel Usage (gal/hr)	Fuel Heating Value (Btu/gal)	Heat Input Capacity (MMBtu/hr)
5.4	141,000	0.761

	Pollutant									
	Benzene	Toluene	Xylenes	Propylene	1,3 Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene	**TOTAL**
Emission Factor in lb/MMBtu (1)	9.33E-04	4.09E-04	2.58E-04	2.58E-03	3.91E-05	1.18E-03	7.67E-04	9.25E-05	8.48E-05	
Controlled Potential Emission in tons/yr (2)	3.11E-03	1.36E-03	8.60E-04	8.60E-03	1.30E-04	3.94E-03	2.56E-03	3.08E-04	2.83E-04	2.12E-02

Note:
(1) Emission Factors were not available for gasoline fueled internal combustion engines.
(2) Emission Factors are based on data from 2 engines, therefore the emissions are rough order-of-magnitude estimates only.

Methodology:
Heat Input Capacity = Max. Fuel Usage (gal/hr) * Fuel Heating Value (Btu/gal) * (MM/1e6)
Emission Factors are from AP-42 (Fifth edition, January 1995), Table 3.3-3
Emission (tons/yr) = Heat Input Capacity (MMBtu/hr) * Emission Factor (lb/MMBtu) * (8760 hr/yr) * (ton/2,000 lb) * Material Usage Limitation